	ns 40% - Garrier Annual Reporting Date Collection Form	REDAC	TED-AVACUET	FOR PUBLIC CEREC	Page 1 CTION
<010>	Study Area Code	330849	Reco	eived & Inspected	
<015>	Study Area Name	BLACK EARTH TEL CO			
<020>	Program Year	2016		JUN 2 & 2015	
<030>	Contact Name: Person USAC should contact with questions about this data	Bruce Schiefelbein		CC Mail Room-	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6086645455 ext.			
<039>	Contact Email Address: Email of the person identified in data line <030>	bruce.schiefelbein@t	tdstelecom.com		
	collegement contact extremes			(check box when complete)	
<100>	Service Quality Improvement Reporting		(complete attached worksheet)	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
<200> <210>	Outage Reporting (voice)		(complete attached worksheet)		
<300>	Unfulfilled Service Requests (voice)	outages to report		A 1111111	
	Detail on Attempts (voice)			411111	
			(attach des	criptive document)	
<320>	Unfulfilled Service Requests (broadband)			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
<330>	Detail on Attempts (broadband)		(attach de	escriptive document)	
<400>	Number of Complaints per 1,000 customers (voice)				
<410>	Fixed			1 1	
<420> <430>	Mobile Number of Complaints per 1,000 customers (broads	pand)		/ 2000000	
<440>	Fixed			A STATE	
<450> <500>	Mobile Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certification)	<b>/ /</b>	
	330849wi510.pdf		]		
<510>	1		(attached descriptive document)	1 1	
	1				
<600>	Functionality in Emergency Situations		(check to indicate certification)	1 1	
	330849wi610.pdf				
4C10>			(attached descriptive document)		
<610>			]	1 100000000	
<700>	Company Price Offerings (voice) Company Price Offerings (broadband)		(complete attached worksheet) (complete attached worksheet)	1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	
<800>	Operating Companies and Affiliates		(complete attached worksheet)		
	Tribal Land Offerings (Y/N)?	(if y	es, complete attached worksheet)	- Traffile	
<1000>	Voice Services Rate Comparability Certification	Ye	25		
<1010>			(attach descriptive document)		
<1100>	Certify whether terrestrial backhaul options exist ()	res or No)   O	(If not, check to indicate certification	1	
<1110>			(complete attached worksheet)	Tarrell Commencer	
<1200>	Terms and Condition for Lifeline Customers		(complete attached worksheet)		
	Price Cap Carriers, Proceed to Price Cap Additional				
<2000>	Including Rate-of-Return Carriers affiliated with Pri	ce cap Local Exchange	(check to indicate certification)		
<2005>			(complete attached worksheet)	18.00 1.00 1.00	
<3000>	Rate of Return Carriers, Proceed to ROR Additional	Documentation Works	(check to indicate certification)	194164	
<3005>			(complete attached worksheet)		

(100) Service Quality Improvement Reporting Data Collection Form				FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	330849		
<015>	Study Area Name	BLACK EARTH T	EL CO	
<020>	Program Year	2016		
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefe	(CONTRACTOR)	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ex	ct.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefe	elbein@tdstelecom.com	
<110>	Has your company received its ETC certification from the FCC?	(yes	/no) <b>O</b>	
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes	/no) O O	
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	company is a	330849will2.pdf	
	Please select the appropriate responses below (Yes, No, Not Applicable) to confit that the attached document(s), on line 112, contains a progress report on its five service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	e-year		Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets		Yes	
<114>	Report how much universal service (USF) support was received		Yes	
<115>	How much (USF) was used to improve service quality and how support was used to impro	ove service quality	Yes	7
<116>	How much (USF) was used to improve service coverage and how support was used to imp			╗
<117>	How much (USF) was used to improve service capacity and how support was used to impr			┪
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.		Not Applicable	

	vice Outage R lection Form	eporting (Voic	ce)	12.3					ON	Form 481 IB Control No. 3060 2013	-0986/OMB Control N	0. 3060-0819
<010>	Study Area Co	ode	_			330849						
<015>	Study Area Na	ame				BLACK EARTH	TEL CO					
:020>	Program Year					2016						
:030>	Contact Name	- Person USAC	should contac	t regarding this	data	Bruce Schie						
<035>		hone Number					ext.					
:039>	Contact Email	Address - Ema	il Address of pe	erson identified	in data line <0	30> bruce.schie	felbein@tdstelecom	. com				
<220>	<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>&gt;</h>
	NORS Reference Number	Outage Start Date		Outage End Date	Outage End Time	Number of Customers Affected		911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
							ee attached					
						- wo	rksheet -					
									-			
	-											
									+			

		EE form 462
		80/2004
<010>	Study Area Code	330849
<015>	Study Area Name	BLACK EARTH TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com
<701>	Residential Local Service Charge Effective Date 1/1/2015	
<702>	Single State-wide Residential Local Service Charge	

<703>

ota	ap	CO.	AL.	- with	<b>dp</b>	404		tes
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee:
_								
				See at	tached worksheet			
								-
								1

Page 5

Assessed		
	The state of the s	Sp. Alls
<010>	Study Area Code	330849
<015>	Study Area Name	BLACK EARTH TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

	ab	- db	1090	-	Broadband Service -	462>	4089	Usage Allowance
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Action Taken Whe Limit Reached (selec
	and the firm of	Trestaction total		Town nate and reco	(maps)	opious specs (maps)	(35)	
		-	See attac	ned				
			worksheet -					
			-					
		+						

			Seatonities with the second
			CERTAMONOMIC POMAGNETATION OF THE STATE OF T
<010>	Study Area Code		330849
<015>	Study Area Name		BLACK EARTH TEL CO
<020>	Program Year		2016
<030>	Contact Name - Person	USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Nur	nber - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address	Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com
<810>	Reporting Carrier	Black Earth Telephone Co.	
<811>	Holding Company	Telephone and Data Systems, Inc.	
<812>	Operating Company	Black Earth Telephone Co.	

<813>	AND	5422	sub-
	Affiliates	SAC	Doing Business As Company or Brand Designation
14			
26			
53	See affa	ached workshe	et
39		Torred Worker	
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59 59			
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			COMPAGN STORY AND STORY OF THE
<010>	Shudu Area Code	ook at province in continue	
<015>	Study Area Code Study Area Name		330849 BLACK EARTH TEL CO
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line	<030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line		bruce.schiefelbein@tdstelecom.com
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation		Name of Attached Document
If your c	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes		
	rm the status described on the attached document(s), on line 920,		
	trates coordination with the Tribal government pursuant to	1	Select sor No or
§ 54.313	B(a)(9) includes:		at Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.		
<922>	Feasibility and sustainability planning;		
<923>	Marketing services in a culturally sensitive manner;		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Tribal Business and Licensing requirements.		

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<010>	Study Area Code	330849
<015>	Study Area Name	BLACK EARTH TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps

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r ex			60/ 1018
<010>	Study Area Code		330849
<015>	Study Area Name		BLACK EARTH TEL CO
<020>	Program Year		2016
<030>	Contact Name - Person USAC should contact regarding this data		Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data	line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data	line <030>	bruce.schiefelbein@tdstelecom.com
		- 1	330849wi1210.pdf
		- 1	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		
		1	
		_	Name of Attached Document
4000	OF BILL BOOK TO BIT.		
<1220>	Link to Public Website	HTTP	
		-	
"Diagon of		1210	
	neck these boxes below to confirm that the attached document(s), on line	1210,	
	bsite listed, on line 1220, contains the required information pursuant to	r.t	
	(a)(2) annual reporting for ETCs receiving low-income support, carriers mu	St	
annually r	eport:		
<1221>	Information describing the terms and conditions of any voice		
112217	telephony service plans offered to Lifeline subscribers,	<b>V</b>	
41222-	W.100 W F F F F		
<1222>	Details on the number of minutes provided as part of the plan,		
<1223>	Additional charges for toll calls, and rates for each such plan.	<b>/</b>	

		The Grant State of the Control of th
		A Desire to the second of the
<010>	Study Area Code	
<010>	Study Area Code Study Area Name	330849
<020>	Program Year	BLACK EARTH TEL CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Bruce Schiefelbein
<039>	Contact Email Address - Email Address of person identified in data line <030>	6086843435 Ext.
		bruce.schielelmetdstelecom.com
	e appropriate responses below (Yes, No, Not Applicable) to note compliance as America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information of the complex of t	a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and nation reported on this form and in the documents attached below is accurate.
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1)i)	
<2011a>		
<2011b>		
		Name of Attached Document(s) Listing Required Information
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
<2012>	·	
<2013>		
<2014> <2015>		
\20132	2010 and luture Prozen Support Calculation (47 CFR § 54.515(c)(4))	
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband	
1000000	Connect America Phase II Reporting (47 CFR § 54.313(e))	
<2017>	Sto year broadband Service Certification	
<2018>	Still year broadband Scivice Certification	
<2020>	Please check the box to confirm that the attached document(s), on lin pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support sl addresses of community anchor institutions to which began providing preceding calendar year.	hall provide the number, names, and
<2021>	Interim Progress Community Anchor Institutions	
		Name of Attached Decimental Lister Required Information
		Name of Attached Document(s) Listing Required Information

Mark of the		The second secon	
<010>	Study Area Code	720040	
<015>	Study Area Name	330849 BLACK EARTH TEL CO	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein	
<035>	Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030>	6086645455 ext. bruce.schiefelbein@tdstelecom.com	
		CONTRACTOR OF THE PROPERTY OF	
CHECK t	he boxes below to note compliance on its five year service quality plan (pursuant	t to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring cor e information reported on this form and in the documents attached	
	Crk y 34.325(1/2). I further certify that the		below is accurate.
		330849wi3010.pdf	
(3010)	Progress Report on 5 Year Plan		
41E-16702-1	Milestone Certification (47 CFR § 54.313(f)(1)(i))	a a	
		Name of Attached Document Listing Required Information	on .
	Please check this box to confirm that the attached document(s), on line 30		
(3011)	§ 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addre providing access to broadband service in the preceding calendar year.		
	providing access to produce in the preceding calendar year,	P==	1
(3012)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}		
(3012)	Community Anchor Institutions (47 Cr ( 3 34.315(1)(1)(1)))		
		Name of Attached Document Listing Required Information	0
	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	O
Please	check these boxes to confirm that the attached document(s), on line 3017	, contains the required information pursuant to § 54.313(f)(2)	compliance requires:
(3015)			
(2016)	Telecommunications Borrowers)  Document(s) for Balance Sheet, Income Statement and Statement of Case	th Flores	
(3010)	bocument(s) for balance sneet, income statement and statement of case	Flows	
(2017)	Mark Control of the C	1	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		
		Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313 $\{f\}$ (2), contains		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a fo	rmat comparable to RUS Operating Report for Telecommunications	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	sh Flows	
(3021)	Management letter and audit opinion issued by the independent certified pu	blic accountant that performed the company's financial audit	
	If the response is no on line 3018, please check the boxes below		
	to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a		LI
	format comparable to RUS Operating Report for Telecommunications		
	Borrowers,		
(3023)	Underlying information subjected to a review by an independent certified public accountant		$\equiv$
(3024)	Underlying information subjected to an officer certification.		<del>                                      </del>
(3025)		sh Flows	
(3036)	Attach the worksheet listing required information		T .
(3020)	orrest the Antonieer lighting tedanies infolliation		
	1		1
		Name of Attached Document Listing Required Information	

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010>	Study Area Code	330849
:015>	Study Area Name	BLACK EARTH TEL CO
020>	Program Year	2016
030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

		AC county part of the part of
<010>	Study Area Code	330849
<015>	Study Area Name	BLACK RARTH TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

certify that I am an officer of the reporting carrier; my respons recipients; and, to the best of my knowledge, the information re	ibilities include ensuring the accuracy of the annual reporting requirements for universal service support eported on this form and in any attachments is accurate.
Name of Reporting Carrier: BLACK EARTH TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/11/2015
Printed name of Authorized Officer: Kevin Hess	
Title or position of Authorized Officer: Executive Vice Pres	ident
Telephone number of Authorized Officer: 6086644160 ext.	
Study Area Code of Reporting Carrier: 330849	Filing Due Date for this form: 07/01/2015

		Portugues premising Survivor and Add.
<010>	Study Area Code	330849
<015>	Study Area Name	BLACK EARTH TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Bruce Schiefelbein
<035>	Contact Telephone Number - Number of person identified in data line <030>	6086645455 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bruce.schiefelbein@tdstelecom.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent)	is authorized to submit the information reported on behalf of the re	porting carrier.
also certify that I am an officer of the reporting carrier; r agent; and, to the best of my knowledge, the reports an	esponsibilities include ensuring the accuracy of the annual data reporting requirements provided to ta provided to the authorized agent is accurate.	the authorized
Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:	Date:	
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent A	Authorized to File Annual Reports for CAF or LI Recipie	ents on Behalf of Reporting Carrier
[일반지] 경투 : [일 : 12 : 12 : 12 : 12 : 12 : 12 : 12 : 1	orized to submit the annual reports for universal service supporteporting carrier; and, to the best of my knowledge, the informa	[1] : [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]
Name of Reporting Carrier:	M-1	
Name of Authorized Agent or Employee of Agent:		
Signature of Authorized Agent or Employee of Agent:		Date:
Printed name of Authorized Agent or Employee of Agent:		
Title or position of Authorized Agent or Employee of Agent		
Telephone number of Authorized Agent or Employee of Age	ent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Attachments

Black Earth Telephone Company, LLC, dba TDS Telecom

State: WISCONSIN

Study Area:

330849

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

As an Incumbent Local Exchange Carrier (ILEC) and Eligible Telecommunications Carrier (ETC), Black Earth has been providing ubiquitous, high-quality voice telecommunications services in its study area for many years. To accomplish and maintain this service level, Black Earth has made significant historical investment to deploy, operate, and maintain an integrated, highly-reliable network. In addition to its own capital spending, Black Earth draws from the federal Universal Service Fund (USF). Universal service support has been (and continues to be) critical in enabling Black Earth's services in its rural markets to be reasonably comparable in quality and price to services in more urban markets, as Congress mandated in the Telecommunications Act. Black Earth draws USF support because the cost of providing voice and data services in its rural study area are substantially higher than those in urban areas, and thus all of the costs cannot be recovered solely from Black Earth's customers while maintaining reasonably comparable prices. Black Earth has made investments to bring high speed data services to its customers when the level of customer revenues and universal service support has made it financially viable to do so.

For Black Earth, federal high cost support is used to help offset ongoing network costs, but the monies received cover only a portion of the cost of updating and operating the network. In 2014, Black Earth received \$141,100 in USF support while incurring in operating expenses and investing in new plant. The attached Schedule A contains a list of specific network improvement projects that were completed in 2014 at the wire center level. Where these projects related to specific DSAs within the wire center, it is so indicated and can be cross-referenced to the exchange map attached as Exhibit 1. As evidenced by these support and expenditure numbers provided for the current reporting year, the universal service support that Black Earth receives covers only a fraction of its cost to provide service. Continued receipt of USF support is vital to helping Black Earth maintain reasonably comparable rates for local exchange service; and to incrementally upgrade its telecommunications facilities and equipment to help meet evolving service requirements and maintain high quality service.

Because USF funding support is modest compared to Black Earth's ongoing network operating expense, the spending of USF support money is primarily focused on repair, maintenance and incremental Black Earth Telephone Company, LLC, dba TDS Telecom

State: WISCONSIN

Study Area:

330849

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

upgrades to maintain existing service levels rather than further expansion of broadband services deeper into the network. Given the current level of customer revenues, the level of universal support, and the technology available today, the additional costs associated with expanding broadband services to unserved portions of the study area, or increasing speeds to already served portions of the study area, far exceed Black Earth's financial ability to make such investments.

The telecommunications industry continues to change rapidly and significantly as a result of the unprecedented pace of technological advances, increasing customer needs and ongoing regulatory reforms. The level of uncertainty brought about by these factors make long-range network planning a difficult task. By necessity, significant capital investment in network upgrades is cyclical. Capital expenditures in one year are typically followed by a number of years of maintenance of the network to allow time for recovery and return on the investment before the next upgrade is undertaken.

Rapid and significant changes in technology are expected to continue to occur in the telecommunications industry over the next five years. Black Earth believes that its existing network architecture will enable it to incorporate many of these technological changes efficiently, but expects that such changes will also shorten product lifecycles and drive an increase in the rate of obsolescence experienced with existing network equipment. However, having the capability to evolve and being able to afford the cost to evolve, are both necessary to support the capital expenditure.

In an attempt to deliver products similar to those available in more urban areas, telecom companies, like Black Earth are under growing pressure to provide access to services and applications that are driving enormous growth in customer demand for bandwidth. Absent predictable and sufficient universal service support for broadband services, Black Earth will be unable to meet this growing demand.

In addition, Black Earth also faces significant regulatory uncertainty at this time. The FCC 's

Transformation Order and subsequent orders on reconsideration have put universal service revenue in a
state of flux. Forecasting universal service revenues and developing long-range, detailed network plans

Black Earth Telephone Company, LLC, dba TDS Telecom

State: WISCONSIN

Study Area:

330849

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

that depend on those revenues has become all but impossible. While the FCC Transformation Order adopted a number of comprehensive reforms to the universal service and intercarrier compensation mechanisms, it also left open the long term framework for universal service. Presently there are multiple plans in front of the FCC proposing new and different frameworks. While some plans provide for continued support under a rate of return (ROR) regime, others propose an optional plan to move in the direction of support based on a model which predicts the costs of a forward looking fiber to the home network. The details of these plans radically differ from one another, and the FCC has given little indication of which of these plans it will move towards. It is also possible that universal service reform for ROR companies will not be resolved in the near term, and that the current mechanisms will continue to struggle along. Given this backdrop, predicting next year's federal universal service amounts, let alone those for the next five years, is tenuous at best.

The most conservative approach would be to utilize status quo whereby we forecast based on past revenues. Yet even this approach is uncertain at best. For example, even under the "status quo" assumption, the FCC is considering (1) represcribing the authorized interstate rate-of-return, possibly to a level lower than the current 11.25%; (2) eliminating high cost support in areas where there is an unsubsidized competitor offering service to less than 100% of customers; (3) limiting the recovery of Interstate Common Line Support (ICLS); and (4) lowering originating switched access rates similar to terminating rates. Having all these unknowns on the planning horizon (most, if not all of which could have a negative impact on Black Earth's level of support) make it near impossible to predict to what extent Black Earth can rely on universal service support at historic levels for continued aid in supporting its network. Any future rulemaking that results from these proposals could have significant impacts on the future network plans of Black Earth.

Given all of the uncertainty surrounding the industry, and the need for Black Earth to allocate scarce resources, invest prudently, and operate efficiently, long range predictive forecasting at any level of granularity is difficult and subject to revision as new information becomes known. Also, the speculative

Black Earth Telephone Company, LLC, dba TDS Telecom

State: WISCONSIN

Study Area:

330849

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nature of planning in this type of environment hinders Black Earth's ability to effectively develop longterm network build out plans based on projected future USF support.

The attached Schedule B summarizes Black Earth's USF received in 2014 and projected expenditures for 2015 – 2019. The projected 5-year period is based upon historical spending data, which, given the many unknown factors, may have limited value in predicting future network needs and may vary widely from actual spending incurred in the forecasted years, and thus should be treated with that in mind.

The content, timing, and specific geographic locations of projects that will be undertaken in the next five years, is unknown at this time. The selection of future projects will be based on the evaluation of many factors, including current consumer demand, limited capital resources and estimated amounts of universal service support. These and other external factors are not within Black Earth's control and are subject to change. Such changes may affect the assumptions and calculations regarding the optimal improvements to network facilities required to provide high-quality advanced services to Black Earth's customers.

With full recognition of the difficulty in predicting exact locations, specific projects or levels of expenditures, Black Earth commits to utilize available universal service support to help maintain and improve network quality, and if feasible, deploy advanced technologies and new services, expand coverage and improve broadband speeds for its customers.

Schedule A

Black Earth Telephone Company, dba TDS Telecom

State: WISCONSIN

Study Area: 330849

54.313(a)(1) Progress Report on Five Year Service Quality Improvement Plan pursuant to § 54.202(a)

2014 Capital Expenditures

Exchange	DSA	DSA Population	Description	Expenditure
BLACK EARTH	04000	1,818		
	04000	1,818		
	04000	1,818		
	Customer specific	1,818		
	04008	247		
	4007	#N/A		
	DSA 04007	#N/A		
	DSA04002	#N/A		
	Various	#N/A		
	Various	#N/A		
	All Exchanges	#N/A		

Schedule B

# Black Earth Telephone Company, LLC (SAC 330849)

### **Line 100 - Service Quality Improvement Reporting**

Rule 54.202(a)(1) and 54.313(a)(1)

#### **USF** Received in 2014

High Cost Loop Support	\$ 333
ICLS Support	\$ 132,312
Safety Net Additive	\$ -
Safety Value Additive	
CAF	\$ 8,484
TOTAL	\$ 141,129

#### **Five-Year Plan**

	2015	2016	2017	2018	2019
Operating Expenses	S				
Capital Expenditures	s		2000		

# BLACK EARTH TEL. CO., WI Exhibit 1 **Broadband Status** DLC LOCATION | DSA **OTHER FEATURES** Existing Exchange Boundary Proposed | Future - Existing TDS Fiber **Broadband Enabled** No DSL TDS Telecom Network Services | OSP Records | Date: 4/27/2015

200) Servici Pata Collect	e Outage Rep tion Form	orting (Vo	ice)						FCC Form 481 OMB Control N July 2013	o. 3060-0986/OMB Contr	ol No. 3060-0819	
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NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures	
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#### Line 330 - Detail on Attempts (broadband)

#### Rule 54.313(a)(3)

Black Earth Telephone Company, LLC has implemented service availability tracking tools and employee training capabilities to respond to direct customer requests for broadband services.

Upon receipt of a new broadband service request, Black Earth Telephone Company, LLC's service advisors follow these steps for provisioning the service:

- The Black Earth Telephone Company, LLC service advisor uses a customized service addressability software tool to determine if broadband service is available to the requested service address. If it is determined that service is offered to the address, an installation order will be initiated and scheduled immediately.
- 2) If the information in the service addressability tool indicates that extension of broadband service to the service address might be possible, a field service technician is dispatched to the customer premise to perform additional diagnostic testing. Such testing will determine whether there are any reasonable adjustments to the network or customer facilities which can be made to enable the provision of service. If tests confirm that broadband service can be offered at the service address, an order is initiated and service is provisioned.
- 3) In situations where Black Earth Telephone Company, LLC's terrestrial broadband service is not available to a requesting customer, Black Earth Telephone Company, LLC has partnered with Dish Network to offer dishNET satellite broadband service to customers. Black Earth Telephone Company, LLC's service advisors are trained to discuss and assist the customer in ordering dishNET broadband service.

As the Commission acknowledged<sup>1</sup>, some of the service areas served by rate of return Carriers like Black Earth Telephone Company, LLC, have characteristics that make it highly cost prohibitive to extend broadband service using terrestrial wireline technology. Except as may be noted in Black Earth Telephone Company, LLC's 5-year plan attached to this filing, any further build-out of terrestrial broadband service to additional locations within its study area will be dependent upon the cost of the technology to be deployed and the capital infrastructure funding level available.

<sup>&</sup>lt;sup>1</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 13-332, released March 3, 2013 at paras 10-11.

# Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection

#### Rule 54.313(a)(5)

TDS Telecommunications Corporation's ILEC companies follow applicable federal and state service quality and consumer protection rules. They comply with quality of service requirements including monitoring and reporting service quality metrics where required. TDS Telecom has implemented numerous consumer protection measures to protect customer information. For example, TDS implemented Customer Proprietary Network Information (CPNI) policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Annually, all employees are required to review TDS' Business Code of Conduct which includes information and requirements on protecting sensitive customer information from improper use and disclosure. TDS data privacy and security policies are reinforced through periodic training required of all employees. Additional consumer protection measures include TDS' use of a third-party verifier to prevent unauthorized presubscribed interexchange carrier (PIC) changes ("Slamming") and the elimination of billing and collection arrangements that could have potentially allowed unauthorized third-party charges to be added to customer's bills ("Cramming").